

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

STINGRAY IP SOLUTIONS LLC,	§	
Plaintiff,	§	
v.	§	CASE NO. 2:23-cv-00503-JRG-RSP
	§	JURY TRIAL DEMANDED
VIVINT, INC.,	§	(Lead Case)
Defendant.	§	

STINGRAY IP SOLUTIONS LLC	§	
Plaintiff,	§	
v.	§	CASE NO. 2:23-cv-00499-JRG-RSP
	§	JURY TRIAL DEMANDED
LEEDARSON IOT TECHNOLOGY INC.,	§	(Member Case)
and LEEDARSON LIGHTING CO. LTD.,	§	
Defendants.	§	

EXHIBIT A

PLAINTIFF'S CLAIM CONSTRUCTION CHART

U.S. Patent No. 7,224,678

Claim Term	Plaintiff's Construction	Plaintiff's Supporting Evidence	Defendants' Construction
Claim 51: Preamble: “An intrusion detection method for a wireless local or metropolitan area network comprising a plurality of stations, the method comprising”	Preamble is not limiting; no construction necessary.	'678 patent at Abstract; 1:8-10, 14-17, 47-57; 2:35-4:8; 5:52-6:7; 6:8-22, 32-44, 45-60; 7:17-20, 34-35, 53-55; 8:1-4, 12-16, 26-28, 43-53, 62-67; 9:9-12, 32-34, 41-44, 56-60; 10:10-12, 19-22, 29-33, 45-49, 54-67; 16:49-62 (claim 51); Figs. 11-21. Any additional evidence relied on by Defendants.	The preamble is limiting.
Claim 51: “generating an intrusion alert”	Plain and ordinary meaning. Alternatively, the term “intrusion alert” should be construed to mean “a notification indicating detection of an anomaly or abnormal event”	'678 patent at Abstract; 2:35-4:8; 6:8-22, 32-44, 45-60; 7:17-20, 34-35, 53-55; 8:1-4, 12-16, 26-28, 43-53, 62-67; 9:9-12, 32-34, 41-44, 56-60; 10:10-12, 19-22, 29-33, 45-49; 16:49-62 (claim 51); Figs. 11-21. US Patent No. 7,082,117 at Abstract; 2:29-3:60; 5:65-6:9, 19-47; 7:3-5; 7:6-33; 7:41-33; 7:62-64; 8:5-9, 18-20, 34-44, 52-55; 8:65-9:1; 9:21-23, 30-33, 45-48, 57-59; 10:9-12, 19-22, 37-45. Any additional evidence relied on by Defendants.	Generating a notification sent by the policing node(s) upon detecting an attempted intrusion

U.S. Patent No. 7,440,572

Claim Term	Plaintiff's Construction	Plaintiff's Supporting Evidence	Defendants' Construction
Claim 1: Preamble: "A secure wireless local area network (LAN) device comprising"	Preamble is not limiting; no construction necessary.	'572 patent at Abstract; 1:6-2:55; Figs. 1-13. '126 patent at Abstract; 1:7-2:3; 2:7-3:2; Figs. 1-13. Any additional evidence relied on by Defendants.	The preamble is limiting.
Claim 1: "cryptography circuit carried by said housing and connected to said MAC and said wireless transceiver for encrypting both address and data information for transmission by at least adding a plurality of encrypting bits to both the address and the data information, and for decrypting both the address and the data information upon reception."	Plain and ordinary meaning.	'572 patent at Abstract; 2:1-19; 2:27-39; 2:52-56; 3:37-57; 4:14-31; 5:20-6:55; 6:65-7:35; 7:1-49; 7:50-64 (claim 1); Figs. 1-13. '126 patent at Abstract; 2:11-3:2; 3:51-63; 4:28-55; 6:52-67; 7:9-44; Figs. 1-13. Expert declaration of Mr. Patrick Kinney (providing testimony regarding the definite meaning to a person of ordinary skill in the art of "cryptography circuit...upon reception" and responding to Defendants' indefiniteness position). Any additional evidence relied on by Defendants.	Governed by Pre-AIA 35 U.S.C. 112 Paragraph 6 Function: encrypting both address and data information for transmission by at least adding a plurality of encrypting bits to both the address and the data information, and for decrypting both the address and the data information upon reception Structure: Indefinite for lack of corresponding structure.
Claim 1: "cryptography circuit"	Plain and ordinary meaning.	'572 patent at Abstract; 2:1-19, 2:27-39, 2:52-56; 3:37-57; 4:14-31;	In the alternative, if the Court does not

	Alternatively, “cryptography circuit” should be construed to mean “a circuit capable of performing cryptography.”	5:20-25; 5:42-6:55; 6:65-7:35; 7:1-49; 7:50-64 (claim 1); Figs. 1-13. '126 patent at Abstract; 2:11-3:2; 3:51-63; 4:12-55; 5:32-6:67; 7:9-44; Figs. 1-13. Any additional evidence relied on by Defendants.	find the above governed by Pre-AIA 35 U.S.C. 112 Paragraph 6: “Hardware employing an algorithm and a cryptographic key and capable of encrypting and decrypting both address and data information for transmission”
Claim 1: “encrypting both address and data information for transmission by at least adding a plurality of encrypting bits to both the address and the data information”	Plain and ordinary meaning.	'572 Patent at Abstract; 2:7-16, 2:26-35; 2:51-55; 4:20-30; 5:31-52; 6:13-17; 6:34-39; 7:12-16; 7:50-64 (claim 1); 8:44-56; 9:32-46; 10:22-36; 11:1-12; 12:9-13; Figs. 1, 2, 7, 8. '572 File History at Nov. 15, 2007 Remarks at pp. 15-18; Feb. 25, 2008, Office Action at pp. 2-7; May 23, 2008, Remarks at pp. 6-17. Expert declaration of Mr. Patrick Kinney (providing testimony regarding the definite meaning to a person of ordinary skill in the art of “encrypting both address and data information for transmission by at least adding a plurality of	Indefinite If not indefinite, it should be construed as: “encrypting both MAC address and MAC data information by at least adding a plurality of encrypting bits to both the address and the data information”

		<p>encrypting bits to both the address and the data information” and responding to Defendants’ construction and indefiniteness position).</p> <p>Any additional evidence relied on by Defendants.</p>	
Claim 1: “decrypting both the address and the data information upon reception”	Plain and ordinary meaning.	<p>’572 Patent at Abstract; 2:7-16, 2:51-55; 4:20-30; 5:31- 41; 6:13-17; 6:34-39; 7:12-16; 7:50-64 (claim 1); 8:44-56; 9:32-46; 10:22- 36; 11:1-12; 12:9-13; Figs. 1, 2, 7, 8.</p> <p>’572 File History at Nov. 15, 2007 Remarks at pp. 15- 18;</p> <p>Feb. 25, 2008, Office Action at pp. 2-7;</p> <p>May 23, 2008, Remarks at pp. 6-17.</p> <p>Any additional evidence relied on by Defendants.</p>	“recovering, upon reception, both the MAC address and the MAC data information that was encrypted”
Claim 1: “medium access controller (MAC)/MAC”	Plain and ordinary meaning.	<p>’572 patent at Abstract; 2:1-7, 20-55; 4:14-19, 31-42; 5:20-25; 6:29-55; Figs. 7-10.</p> <p>’126 patent at Abstract; 2:38-43; 4:28-55; 6:52-67; Figs. 7-10.</p>	Indefinite

		Expert declaration of Mr. Patrick Kinney (providing testimony regarding the definite meaning to a person of ordinary skill in the art of “medium access controller (MAC)/MAC” and responding to Defendants’ construction and indefiniteness position).	
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U.S. Patent No. 7,441,126

Claim Term	Plaintiff's Proposed Construction	Plaintiff's Supporting Evidence	Defendants' Construction
Claim 1: Preamble "A secure wireless local area network (LAN) device comprising:"	Preamble is not limiting; no construction necessary.	'126 patent at Abstract; 1:7-2:3; 2:7-3:2; Figs. 1-13. '572 patent at Abstract; 1:6-2:55; Figs. 1-13. Any additional evidence relied on by Defendants.	The preamble is limiting.
Claims 1: "a cryptography circuit carried by said housing and connected to said MAC and said wireless transceiver"	Plain and ordinary meaning. Alternatively, "cryptography circuit" should be construed to mean "a circuit capable of performing cryptography."	'126 patent at Abstract; 2:11-3:2; 3:51-63; 4:12-55; 5:32-6:67; 7:9-44; Figs. 1-13. '572 patent at Abstract; 2:1-19; 2:27-39; 2:52-56; 3:37-57; 4:14-31; 5:20-6:55; 6:65-7:35; 7:1-49; 7:50-64 (claim 1); Figs. 1-13. Any additional evidence relied on by Defendants.	"Hardware employing an algorithm and a cryptographic key and capable of encrypting and decrypting both address and data information for transmission"
Claim 1: "media access controller (MAC) carried by said housing"	Plain and ordinary meaning.	'126 patent at Abstract; 2:38-43; 4:27-55; 6:46-67; Figs. 1-3, 7-10, 12, 13; claims 1, 5-6, 11-12. '572 patent at Abstract; 2:1-7, 20-55; 4:14-19, 31-42; 5:20-25; 6:29-55; Figs. 1-3, 7-10, 12, 13, claims 1, 2, 8, 14, 26, 38, 47	Indefinite

		Expert declaration of Mr. Patrick Kinney (providing testimony regarding the definite meaning to a person of ordinary skill in the art of “medium access controller (MAC)/MAC carried by said housing” and responding to Defendants’ construction and indefiniteness position).	
Claim 4: “said security information”	“said cryptography information”	<p>’126 patent at Abstract; 1:50-59; 2:34-37; 4:34-44; 6:11-29; 7:24-29; 7:59-8:9 (claim 1); 8:16-21 (claim 3-4); Figure 10.</p> <p>Expert declaration of Mr. Patrick Kinney (providing testimony regarding the definite meaning to a person of ordinary skill in the art of “said security information” and responding to Defendants’ indefiniteness position).</p> <p>Any additional evidence relied on by Defendants.</p>	Indefinite

U.S. Patent No. 7,616,961

Claim Term	Plaintiff's Construction	Plaintiff's Supporting Evidence	Defendants' Construction
Claim 1, Preamble: "A method for dynamic channel allocation in a mobile ad hoc network comprising a plurality of wireless mobile nodes and a plurality of wireless communication links connecting the plurality of wireless mobile nodes together over a plurality of separate channels at different frequencies, the method comprising:"	Preamble is not limiting; no construction necessary.	'961 patent at 4:18-28; 6:14-19; 13:37-50; 15:25-47 (claim 1). Any additional evidence relied on by Defendants.	The preamble is limiting.
Claim 1: "mobile ad hoc network"	Preamble is not limiting; Preamble is not limiting; Alternatively, if construed: "a network, including a number of geographically-distributed potentially mobile nodes wirelessly connected by one or more radio frequency channels, which lacks fixed infrastructure such that the nodes must self-organize and reconfigure as they move, join, or leave the network"	'961 patent at Abstract; 1:11-2:9; 2:22-31; 4:18-28; 5:4-12; 5:19-23; 6:14-19; 8:15-18; 8:56-65; 10:5-9, 42-48; 11:46-48; 13:33-50; 14:41-45; 15:7-21; 15:25-47 (claim 1); Figs. 1-4. U.S. Patent No. 7,082,117 at 1:13-26; 5:37-41. U.S. Patent No. 6,961,310 at 1:11-55; 5:1-20. U.S. Patent No. 7,027,426 at 1:22-45; 4:4-5:2. U.S. Patent No. 6,958,986 at 1:65-67; 2:1-4; 2:15-19; 3:1-7.	"a network, including a number of geographically-distributed mobile nodes wirelessly connected by one or more radio frequency channels, which lacks fixed infrastructure such that the nodes must self-organize and reconfigure as they move, join, or leave the network"

		<p>Expert declaration of Mr. Patrick Kinney (providing testimony regarding the definite meaning to a person of ordinary skill in the art of “mobile ad hoc network” and responding to Defendants’ construction and indefiniteness position).</p> <p>Any additional evidence relied on by Defendants.</p>	
Claim 1: “each node”	Plain and ordinary meaning.	<p>Abstract; 2:22-42; 2:56-67; 3:1-44; 5:4-21; 8:66-9:14; 10:64-11:8; 13:33-14:40; 14:41-15:14; 15:25-47 (claim 1); Figs. 6-7; 15-18</p>	<p>“At each of the wireless mobile nodes in the mobile ad hoc network”</p>